

NOV 19 2007

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**
CHARLOTTE DIVISION **U.S. DISTRICT COURT
WESTERN DISTRICT OF NC**

UNITED STATES OF AMERICA)	CASE NO. 3:07 CR 195-7-C
)	
v.)	MOTION TO CONTINUE
)	DOCKET CALL / TRIAL;
MARIA SALAZAR)	REQUEST THAT MOTION BE
_____)	FILED UNDER SEAL

NOW COMES defendant, Maria Salazar, by and through the undersigned counsel, and respectfully moves this Honorable Court, in the interests of justice, for an order continuing the trial of this matter which is currently scheduled for the December 3, 2007, Criminal Term in the Charlotte Division. In support of this motion, the undersigned states the following:

1. Counsel received discovery materials on or about October 13, 2007. Counsel has met with defendant to discuss the discovery. Counsel is informed that additional discovery may be forthcoming. In addition, counsel has started his own investigation of the charges but that investigation is not yet complete.
2. A thorough review of all of the discovery materials and conferencing with defendant are required before a decision can be made as to whether this matter should be for plea or trial.
3. Counsel for the government does not oppose this motion.
4. Based on the above, counsel for defendant has not had sufficient time to adequately prepare a defense in this case and would not be able to provide effective assistance of counsel if trial were held during this term.

Therefore, for the foregoing reasons, defendant hereby respectfully moves this Court for an order continuing the trial of this matter.

Defendant further requests that this motion be filed under seal.

Dated: November 19, 2007

Respectfully submitted,



s/Scott Gsell
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CERTIFICATE OF SERVICE

I, Scott Gsell, hereby certify that on November 19, 2007, I served a copy of the forgoing Motion to Continue Docket Call/Trial, on interested parties of record, by mailing a true copy thereof, through the United States Mail, first class, postage prepaid, addressed as follows:

Steven Kaufman, Esq.
Assistant United States Attorney
227 West Trade Street
17th Floor
Charlotte, NC 28202

Executed on November 19, 2007, at Charlotte, North Carolina.


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